

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

STUART C. IRBY COMPANY, LLC

Plaintiff

vs.

Case No. 3:24-cv-538-TSL-MTP

**WINDS EXPLORATION AND
PRODUCTION, LLC, and
FRANKLIN IHEKWOABA**

Defendants

SUPPLEMENTAL DECLARATION OF HALEY F. GREGORY

1. I am over the age of 21 and am competent to make the following Declaration.
2. I am counsel of record for Plaintiff Stuart C. Irby Company, LLC (“Irby”).
3. Pursuant to the Court’s Order to Supplement Declaration [ECF No. 4], Irby submits this Declaration.
4. Irby has attempted to serve the Summons and Complaint for this matter on Defendants numerous times pursuant to Rule 106(a) of the Texas Rules of Civil Procedure.
5. Plaintiff conducted research on Defendants and determined that the location where Defendants can probably be found is 12818 Secret Forest Court, Cypress, Texas 77429-8309. Exhibit A, Texas Secretary of State business records for Winds Exploration and Production, LLC.
6. Plaintiff hired Ryan Sciulli, CRS Process Servers to serve the Defendants with the Summons and Complaint.
7. On September 20, 2024, CRS Process Servers attempted service on Defendants. Defendant Ihekwoaba lives in a gated community. CRS Process Servers located a telephone number for Defendant Ihekwoaba and made contact by phone and text message.

8. Defendant Ihekwoaba's phone number is (346) 732-8778. Defendant Ihekwoaba's email address is frankihe@ymail.com.

9. Defendant Ihekwoaba stated that he would be out of the country until October 9, 2024, but that he would accept the paperwork when he returned to Texas.

10. On October 10, 2024, CRS Process Servers again contacted Defendant Ihekwoaba by phone and text message to (346) 732-8778 to serve the Summons and Complaint. CRS Process Servers again attempted service at Defendant Ihekwoaba's gated community.

11. CRS Process Servers continued to leave voice messages for and send text messages to Defendant Ihekwoaba at (346) 732-8778. Defendant Ihekwoaba failed to return phone calls and text messages.

12. CRS Process Servers has not been able to personally serve Defendants with process at the address identified previously in this Declaration or elsewhere.

13. On November 11, 2024, Irby attempted to serve Defendants by certified mail, return receipt requested, to the address identified in Paragraph 5 of this Declaration.

14. That attempt was unsuccessful because Defendant Ihekwoaba will not sign for the certified mail.

15. Because its various attempts to serve Defendants pursuant to Rule 106(a) of the Texas Rules of Civil Procedure have been unsuccessful, Irby seeks leave to serve Defendants pursuant to Rule 106(b) of the Texas Rules of Civil Procedure.

16. Relatedly, Irby seeks additional time to effectuate service on Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 18, 2024.

A handwritten signature in blue ink that reads "Haley F. Gregory". The signature is written in a cursive style with a large, looped "G" at the end.

By: _____
HALEY F. GREGORY

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TEXAS SECRETARY of STATE
JANE NELSON**BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY**

Filing Number: 803115384
Original Date of Filing: September 11, 2018
Formation Date: N/A
Tax ID: 32068347825
Duration: Perpetual

Entity Type: Domestic Limited Liability Company (LLC)
Entity Status: In existence
FEIN:

Name: WINDS EXPLORATION AND PRODUCTION, LLC
Address: 12818 SECRET FOREST CT
CYPRESS, TX 77429-8309 USA

REGISTERED AGENT	FILING HISTORY	NAMES	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES	INITIAL ADDRESS
Name		Address			Inactive Date	
Franklin Ihekwoaba		12818 Secret Ct. Cypress, TX 77429 USA				

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REGISTERED AGENT	FILING HISTORY	NAMES	MANAGEMENT	ASSUMED NAMES	ASSOCIATED ENTITIES	INITIAL ADDRESS
Last Update	Name	Title	Address			
October 30, 2021	Franklin Ihekwoaba	PRESIDENT	12818 Secret Forest Ct Cypress, TX 77429 USA			
October 30, 2021	Franklin Ihekwoaba	DIRECTOR	12818 Secret Forest Ct Cypress, TX 77429 USA			

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